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PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
501 FRONT STREET
NORFOLK, VA 23510
TEL 757-622-PETA
FAX 757-628-0785

04 MAR 19 AM 9:39
Michael Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Bldg. (1101A)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Comments on the API's Test Plan for Reclaimed Petroleum
Hydrocarbons

Dear Administrator Leavitt:

The following comments on the API's High Production Volume (HPV) test plan for the Reclaimed Petroleum Hydrocarbons category are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The API's test plan for Reclaimed Petroleum Hydrocarbons provides a full description of the issues associated with the variability of "slop oil" (API's term) at petroleum refining and handling sites, clearly characterizes the nature of petroleum products as a continuum of hydrocarbon contents, and does not call for any additional animal testing. We have previously commented on similar plans submitted by the API, noting in particular the continuous nature of these products (Petroleum coke, Lubricating oils, Waxes, Gasoline Category, Petroleum Naphthas, Petroleum Gas). The common theme in all these plans is that the primary toxicity of these complex chemical mixtures is generally due to either specific compounds that are already well-characterized (e.g., BTEX or PAH compounds), or to the overall physical properties of the mixture as oily materials. The toxicity of these sorts of materials has been extensively studied both through animal testing and human exposure studies.^{1,2,3,4} We have therefore disagreed with the proposed animal testing in all of the API's previous plans.

Given that the great variability of these compounds depends on the specific circumstances at the petroleum handling facility, and given the extensive characterization of similar compounds in the HPV program and other efforts, the fundamental nature of petroleum compounds in general, and the limited exposure to these compounds, it is completely appropriate that no further animal tests be conducted for these compounds.

I can be reached at 757-622-7382, ext. 8001, or via e-mail at JessicaS@peta.org should you have any questions.

Sincerely,

Jessica Sandler
Federal Agency Liaison

¹ ATSDR. 1995. Toxicological Profile For Polycyclic Aromatic Hydrocarbons (PAHs). Prepared By Research Triangle Institute for the U.S. Department Of Health And Human Services. Public Health Service

² ATSDR. 1999. Toxicological Profile For Total Petroleum Hydrocarbons (TPH). Prepared by Research Triangle Institute for the U.S. Department Of Health And Human Services Public Health Service.

³ McKee, R.H. et al (1987b) Developmental toxicity of EDS recycle solvent and fuel oil. Toxicol 46, 205-215

⁴ IPCS/WHO (1982) Environmental Health criteria 20: Selected petroleum products. Geneva: World Health Organization.